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ONE HUNDRED FIRST CONGRESS
SECOND SESSION

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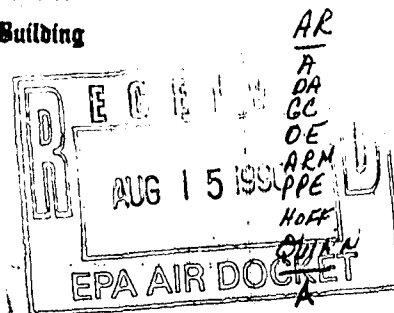
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U.S. House of Representatives
Committee on Energy and Commerce
Room 2125, Rayburn House Office Building
Washington, DC 20515

July 25, 1990



The Honorable William K. Reilly
Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Administrator Reilly:

✓
Enclosed is a letter I received from a member of this Committee, Congressman Thomas J. Bliley, Jr., concerning a proposal by the Ethyl Corporation. That firm has also provided me with materials regarding the pending proposal. I understand other Members of Congress have written in support and in opposition to the proposal. Also, enclosed is a copy of a letter to the Ethyl Corporation about its advertisement.

I have not taken a position. I want to learn more, particularly in light of the provisions of title II of both versions of S. 1630.

Please explain the status of the proposal, its purpose, its need, and such other information as may be appropriate. Is the matter subject to rulemaking, including a public procedure? To what extent will it reduce emissions, as suggested by Congressman Bliley? The Ethyl Corporation explains that it is conducting testing in consultation with the auto industry and your agency. Please explain your role. Will it have adverse effects for the vehicle or the emission system? What are the advantages and disadvantages? How will it be affected by S. 1630?

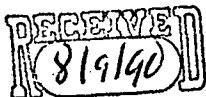
I request your reply this month.

With best wishes.

Sincerely,

John D. Dingell

JOHN D. DINGELL
CHAIRMAN



Enclosure

The Honorable William K. Reilly
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cc: The Honorable Norman F. Lent, Ranking Minority Member
Committee on Energy and Commerce

The Honorable Philip R. Sharp, Chairman
Subcommittee on Energy and Power

The Honorable Carlos J. Moorhead, Ranking Minority Member
Subcommittee on Energy and Power

The Honorable Henry A. Waxman, Chairman
Subcommittee on Health and the Environment

The Honorable Edward R. Madigan, Ranking Minority Member
Subcommittee on Health and the Environment

The Honorable Thomas J. Bliley, Member
Committee on Energy and Commerce

Mr. Thomas Hanna, President
Motor Vehicle Manufacturers Association

Mr. George C. Nield, President
Automobile Importers of America

Mr. Ray Wilkins, Senior Vice President
Ethyl Corporation

THOMAS J. BILEY, JR.
3d DISTRICT, VIRGINIA

MEMBER OF
COMMITTEE ON ENERGY
AND COMMERCE
COMMITTEE ON THE DISTRICT
OF COLUMBIA
SELECT COMMITTEE ON
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Congress of the United States
House of Representatives
Washington, DC 20515

May 10, 1990

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515

Dear Mr. Chairman:

On May 9, 1990, Ethyl Corporation submitted a waiver request to EPA to use "HiTECH 3000" as a fuel additive in unleaded gasoline. Tests have indicated that "HiTECH 3000" will be a great aid in the Clean Air battle by reducing NOx and CO tailpipe emissions and also reducing the need for aromatics in the fuel.

I have enclosed a fact sheet on "HiTECH 3000" for your information. I shall provide your staff with more detailed data on latest test data. I would greatly appreciate your consideration of this matter and hope for your support of Ethyl's waiver request.

With kindest personal regards, I am

Sincerely,


Thomas J. Biley, Jr.

TJBj:jd

Biley 28 July 90 letter - re 903076 response dated 7/30/90

Box 12
Shelter Island Heights
New York, 11965
June 26, 1990

The President
Ethyl Corporation
P.O. Box 2189
Richmond, VA., 32317

Dear Mr. President:

Today's Washington Post Ethyl advertisement tries to promote HiTEC 3000 Performance Additive for cars by bashing bicycle riding as "not very practical for America"--and, impliedly, communistic and worse, Chinese.

This tactic is as offensive as it is inane and unthinking. I hope you will find better ways to promote your product.

Communist China. What has Communist China got to do with the issue except to associate bikes with communism and cars with "America"? In case you haven't been out of Richmond much recently, there's lots of bike commuting, for instance, in perfectly respectable European countries.

Practicality. What is so "impractical" about bicycles, which are the major mode of transportation in the world? What is "impractical" about bicycles "for America", where thousands ride to work (and more would ride if roads were better designed to accomodate both cars and vehicles other than cars) and millions ride for recreation?

In that connection, what is so "practical" about cars? They serve some purposes very well. Other purposes, such as moving commuters in and out of major cities, they serve less well than other forms of transportation. There is nothing "practical" about the rate of growth in automobiles in this country, which threatens to gridlock our cities and convert our open spaces to wasteful suburban mall-and-sprawl.

Relevance. What does bashing bicycle riding have to do with promoting a fuel additive for cars? Why don't you compare it, for starters, to other fuel additives?

Yours,

Christopher C. Herman

8 May 1990

• WAIVER REQUEST: ON 9 MAY ETHYL SUBMITS REQUEST TO EPA TO USE "HITEC 3000" FUEL ADDITIVE IN UNLEADED GASOLINE. (EPA WILL SOLICIT PUBLIC COMMENTS, AND HAS 180 DAYS TO MAKE DECISION.)

• HITEC 3000 IS: ETHYL'S TRADEMARK FOR "MMT," A MANGANESE-BASED ANTI-KNOCK AND OCTANE BOOSTER. WAIVER IS FOR 1/32 GRAM (ONE DROP) PER GALLON. (HALF TEASPOON PER 20 GALLONS.)

• INEXPENSIVE: PROVIDES APPROXIMATELY ONE OCTANE NUMBER BOOST AT 1/3 TO 1/5 COST OF AROMATICS, MTBE, OR ETBE.

• CANADA: MMT USED IN UNLEADED GASOLINE SINCE 1978 AT UP TO TWICE CONCENTRATION BEING REQUESTED FOR U.S. USE. NO HEALTH PROBLEMS. NO SUBSTANTIATED AUTOMOTIVE PROBLEMS.

• TESTING: EXTENSIVE TWO YEAR TEST. DESIGNED IN COORDINATION WITH EPA. 48 (1988 MODEL) CARS DRIVEN 75,000 MILES EACH. CARS REPRESENT 53% OF U.S. SALES. BIG 3 RECOMMENDED MODELS (4 GM, 3 FORD, 1 CHRYSLER). GM'S FUEL DIRECTOR (Joseph Colucci) STATED THAT ETHYL "PUT TOGETHER A HELL OF A GOOD WAIVER PROGRAM."

• TESTS DEMONSTRATED THAT HITEC 3000 USE WILL:

- REDUCE NO_x AND CO TAILPIPE EMISSIONS. 20 PERCENT FOR NO_x.
- HAVE NO PRACTICAL, ADVERSE EFFECT ON HC EMISSIONS.
- ENABLE REDUCING AROMATICS IN GASOLINE BY 1.2 TO 2 PERCENTAGE POINTS (e.g., from 32% to 30.8-30%).
- ENABLE REDUCED GASOLINE VOLATILITY.
- REDUCE POLLUTANTS 1.7 BILLION POUNDS ANNUALLY BY 1999.
- REDUCE OZONE IN 1994 THE EQUIVALENT OF REMOVING 170,000 CARS (5% CURRENT FLEET) IN GREATER PHILADELPHIA AND 129,000 CARS (7%) IN GREATER ATLANTA.
- SAVE MORE CRUDE OIL ANNUALLY THAN PURCHASED EACH YEAR FOR THE STRATEGIC PETROLEUM RESERVE.
- CAUSE NO PROBLEMS WHEN ADDED TO GASOLINE CONTAINING OXYGENATES, METHANOL, ETHANOL.
- CAUSE NO DAMAGE OR DETERIORATION OF AUTO EMISSIONS CONTROL SYSTEMS. (NO DURABILITY PROBLEMS, NO CATALYST PLUGGING, NO LOSS OF BACK PRESSURE.)
- CAUSE NO HEALTH OR ENVIRONMENTAL PROBLEMS.

• POTENTIAL CRITIC -- ENVIRONMENTAL LOBBY: SOME ACTIVISTS MIGHT CLAIM HEALTH JEOPARDY FROM "MAJOR/TOXIC" AIRBORNE MANGANESE INCREASES. COUNTER: MANGANESE IS TRACE ELEMENT ESSENTIAL TO LIFE. ONLY INFINITESIMALLY SMALL MN EMISSIONS WOULD RESULT FROM HITEC 3000. AT THESE TRACE LEVELS, EPA HAS IN THE PAST FOUND NO HEALTH PROBLEMS.

• POTENTIAL CRITIC -- AUTO INDUSTRY: SOME FEARS OF CATALYST PLUGGING AND HC TAILPIPE INCREASES. COUNTER: ETHYL TEST RESULTS REFUTE. AUTO INDUSTRY DOES NOT HAVE COMPARABLE EXTENSIVE TESTS.

- REF HC EMISSIONS: THERE WOULD BE NO INCREASE UNDER COMMERCIAL CONDITIONS. ETHYL'S TESTS DETECTED A QUITE SMALL, AVERAGE INCREASE OF 0.01 TO 0.018 GPM, DEPENDING ON DATA INTERPRETATION. HOWEVER, THERE WOULD BE NO NET INCREASE IN COMMERCIAL FUEL. LOW-COST HITEC 3000 WOULD REPLACE AROMATICS WHICH CAUSE NOT ONLY HC EMISSIONS BUT OTHER POLLUTANTS AND RAISE FUEL VOLATILITY AS WELL.

• BOTTOM LINE: NONE OF THE POTENTIAL CRITICS HAS REVIEWED ALL OF ETHYL'S DATA AND TEST ANALYSES. AUTO INDUSTRY SHOULD NOT PREJUDGE BUT REVIEW ALL DATA DURING COMMENT PERIOD. ETHYL'S TEST RESULTS APPEAR IMPRESSIVE. LET EPA RESOLVE ANY EVENTUAL CONFLICTS.